

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF NEWPORT NEWS

ROBERT T. REEVES,

Plaintiff,

v.

CIVIL ACTION NO: CL1602800N-05

ZACHARY RAMIREZ,

Defendant.

PLEASE SERVE:

**ZACHARY RAMIREZ
3051 SW BURLINGAME ROAD
TOPEKA, KS 66611**

**GOVERNMENT EMPLOYEES INSURANCE COMPANY
JOSEPH R. THOMAS, REGISTERED AGENT
1345 PERIMETER PARKWAY
VIRGINIA BEACH, VA 23454**

FILED
2016 AUG 17 PM 3:13
CITY OF NEWPORT NEWS, VA
SARY S. ANDERSON
CLERK

COMPLAINT

COMES NOW the Plaintiff, **ROBERT T. REEVES**, by counsel, and moves for judgment against the defendant **ZACHARY RAMIREZ** on the grounds and in the amount as hereinafter set forth:

1. The subject matter of this suit and all allegations contained herein occurred on May 30, 2015, at approximately 5:10 p.m., in Newport News, Virginia, on Interstate 64 eastbound at or near the Ft. Eustis Boulevard exit ramp.
2. That at the time of the accident, the Plaintiff, **ROBERT T. REEVES**, hereinafter referred to as **REEVES** was a resident of Hampton, VA.
3. That at the time of the accident, the Defendant, **ZACHARY RAMIREZ**, hereinafter referred to as **RAMIREZ**, was a resident of Topeka, Kansas, having his residence at 3051 SW Burlingame Road, Topeka, Kansas 66611.

4. **REEVES** was the driver of a 2014 Mitsubishi Outlander Sport, Virginia License Plate Number WXU-3488 owned by Nicole Danielle Nickelberry, and was properly, safely and lawfully traveling eastbound on Interstate 64, stopped for traffic when he was rear-ended by **RAMIREZ**.
5. **RAMIREZ** was operating a 2002 BMW 540i Sedan, Kansas License Plate Number unknown and was traveling in the eastbound on Interstate 64, when he carelessly and negligently failed to keep a proper lookout, travel at safe speeds, and keep a safe distance and violently and recklessly rear-ended **REEVES**.
6. It was the duty of **RAMIREZ** to operate his vehicle in a safe manner, with reasonable care, and in compliance with the laws of Virginia or rules of the road, and with due regard for others using the road, including **REEVES**. It was further the duty of the defendant to maintain proper control of his vehicle, to keep a proper lookout, travel at safe speeds, and keep a safe distance, and to otherwise drive in a safe and proper fashion. **RAMIREZ** negligently failed to comply with these and other duties.
7. **RAMIREZ** breached the above mentioned duties when he carelessly, recklessly, improperly and negligently operated his vehicle in such a manner as to cause his vehicle to collide with the **REEVES'** vehicle with great force and violence, causing significant damage, and causing **REEVES** to suffer great pain of body and mind.
8. As a direct and proximate cause of **RAMIREZ'S** aforesaid negligence, **REEVES** was caused to sustain serious and grievous injuries; has been prevented from transacting his business; has suffered and believes he will continue to suffer great pain of body and mind; has lost wages and has sustained loss of earning capacity and has incurred financial and economic damage; has

incurred and will incur in the future hospital, doctor's and related bills in an effort to be cured of said injuries; and such other injuries and damages that may be established at trial.

9. That at the time of the aforesaid collision, the vehicle that REEVES was driving, was covered under the under-insured and uninsured motorist provisions of a certain motor vehicle public liability policy issued to Nicole Danielle Nickelberry, by Government Employee Insurance Company; therefore, process should be made on Government Employee Insurance Company, pursuant to Section 38.2-2206(f) of the Code of Virginia.

10. That REEVES, pursuant to section 8.01-382 of the 1950 Code of Virginia, be awarded pre- and post-judgment interest at the highest rate allowable by law per annum from the date of the injury for monetary losses, including without limit, pain and suffering, and from the date of the incurrence of any other specific damage.

WHEREFORE, Plaintiff, ROBERT T. REEVES, demands judgment against the defendant, ZACHARY RAMIREZ in the sum of FIVE HUNDRED THOUSAND DOLLARS and NO CENTS (\$500,000.00), and costs in his behalf expended, all with pre- and post-judgment interest at the highest rate allowed by law.

ROBERT T. REEVES

By 

OF COUNSEL

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